



HS&E CORPORATE SERVICES
Toxicology Department

201-15073

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January 12, 2004

The Honorable Mike Leavitt, Administrator
U.S. EPA
P.O. Box 1473
Merrifield, VA. 22116

Subject: Update - High Production Volume Chemicals Initiative
Withdrawal of Support - CAS # 38051-10-4 Phosphoric acid, 2,2-bis(chloromethyl)-1,3-propanediyl tetrakis(2-chloroethyl) ester

Dear Administrator Leavitt:

As a continuing participant in the High Production Volume (HPV) chemical testing program, Rhodia Inc. is volunteering to support the generation and reporting of data for many HPV chemicals that we produce or import. We have joined consortia with other companies and volunteered individually to perform the tasks requested under the initiative.

Since I last wrote to the Agency, a change in market conditions has occurred which impacts our commitments. We have updated the ICCA-sponsored HPV website as appropriate, and we would ask that your staff please update the EPA HPV website accordingly.

- Concerning CAS # 38051-10-4 Phosphoric acid, 2,2-bis(chloromethyl)-1,3-propanediyl tetrakis(2-chloroethyl) ester, Rhodia Inc. sold its manufacturing business for this chemical to Albemarle Chemical Company and, thus, is withdrawing its support from the ICCA HPV program. Further, this chemical is being addressed under the 4th EU Priority Chemical list.

I continue to serve as Rhodia Inc.'s technical contact for the HPV initiative. I can be reached at:

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Sincerely,

Glenn S. Simon, Ph.D., DABT
Director of Toxicology

cc: Charles M. Auer, U.S. EPA
Barbara Leczynski, U.S. EPA
Jim Keith, American Chemistry Council
Paul Larson, Rhodia Inc.
Steve Groome, Rhodia (UK)